

AO 91 (Rev. 11/11) Criminal Complaint

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF MISSISSIPPI

UNITED STATES DISTRICT COURT

for the

Southern District of Mississippi

FILED

Jul 02 2021

ARTHUR JOHNSTON, CLERK

United States of America

v.

Dalonzo Labbaron Fuller

Case No. 1:21-mj- 560-RPM

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of July 1, 2021 in the county of Jackson in the
Southern District of MS Southern Division, the defendant(s) violated:*Code Section**Offense Description*21 U.S.C. § 841(a)(1)
and (b)(1)(A)

Possession with Intent to Distribute Controlled Substances.

This criminal complaint is based on these facts:

See affidavit attached hereto and incorporated herein

☒ Continued on the attached sheet.*Complainant's signature*

Brodey B. Gibson, Special Agent, FBI

Printed name and title

Sworn to before me and signed in my presence.

Date:

7/2/2021*Judge's signature*

City and state:

Gulfport, Mississippi

Robert P. Myers Jr., United States Magistrate Judge

Printed name and title

AFFIDAVIT

I, Brodey B. Gibson, being duly sworn, state as follows:

1. I am a Special Agent of the Federal Bureau of Investigation (FBI) and have been so employed for seven months. I am currently assigned to FBI, Jackson Division, Pascagoula Resident Agency in Mississippi. During my law enforcement tenure, I have received training and experience in surveillance tactics, interview and interrogation, search and seizure, forfeiture procedures, and criminal interdiction.

2. This affidavit is submitted in support of a criminal complaint alleging Dalonzo Labbaron Fuller (hereinafter FULLER) concerning offenses involving violations of Title 18, United States Code, Section 841(a)(1), namely, the distribution of controlled substances; Title 21, United States Code, Section 846, conspiracy to commit narcotics trafficking offenses; Title 21, United States Code, Section 843(b), the use of a communication facility in the commission of narcotics trafficking offenses. Because this affidavit is being submitted for the limited purpose of establishing probable cause in support of a criminal complaint charging FULLER with, the distribution of controlled substances, conspiracy to commit narcotics trafficking offenses, and the use of a communication facility in the commission of narcotics trafficking offenses, I have not included each and every fact known to me concerning this investigation. I have set forth only the facts which I believe are necessary to establish probable cause to believe the defendant committed the offense alleged in the complaint.

3. This affidavit is based on my participation in this investigation, reports I have read related to this investigation, and conversations I have had with other law enforcement personnel who have knowledge of the events and circumstances described herein.

I. FACTS SUPPORTING PROBABLE CAUSE

A. June 11, 2021

4. On Friday, June 11, 2021 SMMET Agents received information that an individual had rented unit 751 at the Central Self Storage, 2902 Bartlett Avenue, Pascagoula, MS 39581 for FULLER and the individual also stated there was possibly a stolen motorcycle in the storage unit. SMMET Agents later determined through investigative techniques that FULLER was also utilizing unit 744.

5. Verification was obtained that FULLER paid the rental for Unit 744 and 751 each month in cash.

6. SMMET Agents utilized a narcotics detection k-9 that showed a positive response to the odor of narcotics on unit 743 near the corner of unit 744.

B. July 01, 2021

7. On Thursday, July 01, 2021, South Mississippi Metro Enforcement Team (SMMET) executed a state search warrant on unit 744 and a state document search warrant on unit 751 at the Central Self Storage, 2902 Bartlett Avenue, Pascagoula, MS 39581.

8. During the search of unit 751 SMMET Agents seized approximately \$269,000.00 United States Currency and a Smith & Wesson, M&P 15-22, serial number HCL6781 which had one round in the chamber and a loaded magazine.

9. SMMET Agents also executed a search warrant on unit 744 at the Central Self Storage, 2902 Bartlett Avenue, Pascagoula, MS 39581. Agents seized approximately 417 grams of methamphetamine, 813 grams of fentanyl, 1,566 grams of heroin, digital scales, and a hydraulic kilo press. SMMET Agent Tony Brachear conducted a field test on the above listed substances with produced a presumptive positive test for the respective substance.

II. CONCLUSION

10. Based on the above, your Affiant believes there is probable cause to believe on or about July 01, 2021, FULLER was in violation of Title 21, United States Code, Section 841(a)(1), namely, the distribution of controlled substances.

FURTHER AFFIANT SAYETH NOT.



Brodey B. Gibson
Special Agent
Federal Bureau of Investigation

SUBSCRIBED AND SWORN to before me on July 2, 2021.



ROBERT P. MYERS, JR.
United States Magistrate Judge